

From: [Moore, Gary](#)
To: [Terry Andrews](#)
Subject: RE: CES (A6KC) Air Sampling (Summa) On-Site and in Residential Areas
Date: Wednesday, August 13, 2014 2:38:01 PM
Attachments: [image002.png](#)

8 hrs

Gary Moore

Federal On-Scene Coordinator

U.S. EPA Region 6

214-789-1627 cell

214-665-6609 office

moore.gary@epa.gov

From: Terry Andrews
Sent: Wednesday, August 13, 2014 2:36 PM
To: Moore, Gary
Cc: Omar Valdez; monica.harris@tceq.texas.gov
Subject: FW: CES (A6KC) Air Sampling (Summa) On-Site and in Residential Areas

Hi Gary,

Please see the comments from Tracie. She would like to know what the sample durations were.

Thanks,
Terry

From: Tracie Phillips
Sent: Wednesday, August 13, 2014 1:51 PM
To: Terry Andrews; Monica Harris; Nicole Bealle
Cc: Michael Honeycutt; Joseph Haney; Cindy Maresh; Richard Chism
Subject: RE: CES (A6KC) Air Sampling (Summa) On-Site and in Residential Areas

Hi Terry,

It appears as though EPA attempted to integrate the TCEQ AMCVs (Air Monitoring Comparison Values) into their summary table. In case you aren't familiar with them, AMCVs are chemical-specific air concentrations set to protect human health and welfare (including sensitive subpopulations) that the Toxicology Division has developed. We have developed short-term and long-term AMCVs; short-term AMCVs are derived to evaluate acute exposures while long-term AMCVs are derived to evaluate an exposure over a lifetime (i.e., 70 years). In order to appropriately use a long-term AMCV, at least one year's worth of data is needed to obtain an annual average for comparison.

I have looked over the provided spreadsheet and lab report and have the following observations/corrections:

- 1) There is no indication of what the duration is for the SUMMA samples, this would be important to know, although my assumption is that the duration is 24-hr or less
- 2) My assumption is that these samples were collected in ambient conditions and not inside a building
- 3) EPA is using TCEQ AMCVs and calling them Criteria – AMCVs are not criteria, and they are not standards, AMCVs are screening levels
- 4) EPA has erroneously used the long-term AMCVs, see discussion on AMCVs above as to why this is not appropriate or scientifically correct
 - I went through the spreadsheet and put in the appropriate short-term and odor AMCVs that are available (changes are marked with red font, cells with

changes are highlighted in red)

5) I'm not sure why EPA has highlighted isoprene (2-methyl-1,3-butadiene), I don't see a screening level for it on EPA's RSL Tables, nor is there one listed in the provided summary table

6) EPA is using their RSL (Regional Screening Level) Table to populate their Residential and Industrial "Criteria" in the summary table. RSL values are chronic (i.e., long-term) values, not short-term. For the same reasons it is inappropriate and not scientifically correct to use the long-term AMCVs, it is not appropriate to use these chronic comparison values to evaluate short duration data.

I reviewed the data based on the appropriate TCEQ AMCVs, and the data all look fine. All of the detections are very low and would be within the range of background for ambient air. Please provide me with some site information, so I have a little more context about the data I reviewed. If you have any further questions, don't hesitate to contact me.

Thanks!

Tracie

Tracie Phillips, Ph.D. | Senior Toxicologist | TCEQ

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✉: tracie.phillips@tceq.texas.gov



From: Michael Honeycutt

Sent: Tuesday, August 12, 2014 3:51 PM

To: Joseph Haney; Tracie Phillips

Subject: FW: CES (A6KC) Air Sampling (Summa) On-Site and in Residential Areas

Can you please get someone to take a look?

Thanks,

Mike

Michael E. Honeycutt, Ph.D.

Director, Toxicology Division

**Texas Commission on
Environmental Quality**

✉:

Michael.Honeycutt@tceq.texas.gov

☎: (512) 239-1793

7: (512) 239-1794

🖨: [TCEQ Toxicology Home Page](#)



From: Richard Chism

Sent: Tuesday, August 12, 2014 2:08 PM

To: Michael Honeycutt

Subject: Fwd: CES (A6KC) Air Sampling (Summa) On-Site and in Residential Areas

Mike,

This was sent to our air lab staff but it looks like something that may be more in y'all's area of expertise. If not, feel free to bounce it back and we'll figure it out.

Begin forwarded message:

From: "Cindy Maresh" <cindy.maresh@tceq.texas.gov>

To: "Richard Chism" <Richard.Chism@tceq.texas.gov>

Subject: FW: CES (A6KC) Air Sampling (Summa) On-Site and in Residential

Areas

Cory,

I believe the email below needs to be answered either by Toxicology or possibly AQD. EPA wants to know (from Remediation) if the analyzing lab was using “TCEQ criteria”.

I’m unaware of any “TCEQ Criteria”. Referring to the attached Air Data Summary, I thought maybe they were referencing ESLs, e.g. benzene long term ESL is 1.4 ppbv, but if that’s the case, none of the other numbers appear correct according to the current ESL list (table below).

Substance

CASNo.

**Short-term ESL
(ug/m3)**

**Short-term ESL
(ppb)**

**Long-term ESL
(ug/m3)**

**Long-term ESL
(ppb)**

benzene

71-43-2

170

54

4.5

1.4

dioxane, 1,4-

123-91-1

900

250

90

25

ethyl benzene

100-41-4

740

170

570

135

Checking to see if you want me to forward the request, or if you'd prefer to handle?

Cindy

From: Terry Andrews

Sent: Tuesday, August 12, 2014 12:15 PM

To: Ken Lancaster; Cindy Maresh

Cc: Monica Harris; Nicole Bealle

Subject: FW: CES (A6KC) Air Sampling (Summa) On-Site and in Residential Areas

HI,

Could you please take a look at the attached data summary and tell us if the TCEQ Criteria that is listed in the table is the correct criteria to use? Summa cans 01 and 02 were collected from residential property. Summa cans 03 and 04 were collected from commercial property.

Thank you,

Terry

Terry Andrews, P.G., Team Leader

Remediation Division

Texas Commission on Environmental Quality

Ph: 713.767.3560

[\[http://home.tceq.state.tx.us/internal/exec/communication/gif/tceqseal_color_initials.gif\]](http://home.tceq.state.tx.us/internal/exec/communication/gif/tceqseal_color_initials.gif)

From: Nicole Bealle

Sent: Tuesday, August 12, 2014 11:55 AM

To: Monica Harris

Cc: Terry Andrews

Subject: RE: CES (A6KC) Air Sampling (Summa) On-Site and in Residential Areas

The staff that would be able to give information and is familiar with the process/results would possibly be with the Laboratory and Quality Assurance staff:

Ken Lancaster
Cindy Maresh

From: Monica Harris
Sent: Tuesday, August 12, 2014 8:37 AM
To: Terry Andrews; Nicole Bealle
Subject: RE: CES (A6KC) Air Sampling (Summa) On-Site and in Residential Areas

Nicole-can someone from air review this?

From: Terry Andrews
Sent: Tuesday, August 12, 2014 8:36 AM
To: Monica Harris
Subject: FW: CES (A6KC) Air Sampling (Summa) On-Site and in Residential Areas

Monica,
We need an air expert to look at this. I don't work with this enough to consider myself an expert. The EPA wants to know if they are using the appropriate TCEQ criteria.
Terry

From: Moore, Gary [<mailto:Moore.Gary@epa.gov>]
Sent: Monday, August 11, 2014 4:08 PM
To: Omar Valdez; Terry Andrews; Nicole Bealle; sharon.reese@houstontx.gov<<mailto:sharon.reese@houstontx.gov>>
Cc: Webster, Susan; Villarreal, Chris; Rauscher, Jon
Subject: CES (A6KC) Air Sampling (Summa) On-Site and in Residential Areas

Hello:

Attached is the lab data for the Summa cans pulled at the site and in the residential area. Please take a look at the summary and the lab data and give me comments. I put the table together so there may be some errors so please check. Also, are there any other comparison data that we should be looking at?

At the bottom of the air data summary it shows the air sampling locations. If you need a map, I can put one together.

CES-CS-Summa-01 – Spill path from site to Kingsbury (drainage path off the site)

CES-CS-Summa-02 – South of Kingsbury (across street from drainage path off the site)

CES-CS-Summa-03 – Onsite by gate we repaired (closer to vacuum boxes)

CES-CS-Summa-04 – Onsite between the north and south tank batteries

I only had hits above the residential levels was a TIC of 2 methyl-1,3-butadiene. I also had some hits about the residential standard on the site of several compounds but those should probably be evaluated against the industrial standard.

Let me know if I made any errors or missed anything.

Thanks

**Gary Moore
Federal On-Scene Coordinator
U.S. EPA Region 6
214-789-1627 cell
214-665-6609 office**

moore.gary@epa.gov<<mailto:moore.gary@epa.gov>>